

EXHIBIT F

FILED UNDER SEAL

CONTAINS CONFIDENTIAL OR HIGHLY CONFIDENTIAL
INFORMATION SUBJECT TO PROTECTIVE ORDER

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC.,)
))
))
Plaintiff,)
))
v.))
))
1) CASTLE HILL STUDIOS LLC)
(d/b/a CASTLE HILL GAMING);)
2) CASTLE HILL HOLDING LLC)
(d/b/a CASTLE HILL GAMING); and)
3) IRONWORKS DEVELOPMENT, LLC)
(d/b/a CASTLE HILL GAMING))
))
Defendants.)

Case No. 4:17-cv-00454-GKF-JFJ

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**PLAINTIFF’S THIRD SUPPLEMENTAL OBJECTIONS AND RESPONSES TO
DEFENDANT CASTLE HILL STUDIO LLC’S INTERROGATORIES NOS. 4–6**

Pursuant to Federal Rule of Civil Procedure 33, Plaintiff Video Gaming Technologies, Inc. (“VGT”) provides these supplemental objections and responses to Interrogatories Nos. 4–6 of Defendant Castle Hill Studio LLC (collectively with the other defendants, “CHG”) (the “Interrogatories”), which supplement its initial responses that were served on November 22, 2017, its first supplemental responses that were served on December 27, 2017, and its second supplemental responses that were served on March 16, 2018.

PRELIMINARY STATEMENT

In responding to these Interrogatories, VGT does not concede the relevance, materiality, or admissibility of any Interrogatory. VGT’s response to each Interrogatory is made subject to and without waiver of any objections as to privilege or as to the relevance, materiality, or admissibility, for any purpose, of any of the responses given herein.

of 9
CONTAINS CONFIDENTIAL OR HIGHLY CONFIDENTIAL
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20. The following responses are based on information reasonably available to VGT. VGT reserves its right to amend or supplement these objections and responses as additional information becomes available or is disclosed or in the event of error, inadvertent mistake, or omission.

SPECIFIC OBJECTIONS AND RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 4:

State all facts supporting your misappropriation of trade secrets claim. (As part of your answer, describe with specificity each trade secret you claim CHG misappropriated, and for each such trade secret (hereafter in this interrogatory, “it”) state when it was taken, how it was taken, who took it, how CHG obtained it, how CHG has used it (including, if applicable, in which CHG Games it has been used), why it has independent economic value, the approximate value of it, VGT’s efforts to keep it secret, when such efforts to keep it secret began and finished, and why it could not be derived independently with publicly-available information.)

OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 4:

VGT incorporates the General Objections stated above as if set forth fully herein and in particular objects to this interrogatory as overbroad and unduly burdensome and to the extent that it seeks Privileged Information. VGT further objects to this interrogatory to the extent that it purports to be a single interrogatory under Civil Local Rule 33.1 and to the extent it seeks information that is in CHG’s possession or otherwise not in the possession, custody or control of VGT. VGT further objects to this interrogatory to the extent its seeks premature expert discovery by, *inter alia*, asking VGT to place an “approximate value” on each trade secret. Subject to and without waiving the preceding general and specific objections, VGT responds as follows:

of 9
CONTAINS CONFIDENTIAL OR HIGHLY CONFIDENTIAL
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[REDACTED]

[REDACTED]

END HIGHLY CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

THIRD SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 4:

BEGIN HIGHLY CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

[REDACTED]

CONTAINS CONFIDENTIAL OR HIGHLY CONFIDENTIAL
INFORMATION SUBJECT TO PROTECTIVE ORDER

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

INTERROGATORY NO. 5:

33

of 9
CONTAINS CONFIDENTIAL OR HIGHLY CONFIDENTIAL
INFORMATION SUBJECT TO PROTECTIVE ORDER

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CONTAINS CONFIDENTIAL OR HIGHLY CONFIDENTIAL
INFORMATION SUBJECT TO PROTECTIVE ORDER

CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2018, I sent via email a true and correct copy of the foregoing PLAINTIFF'S THIRD SUPPLEMENTAL OBJECTIONS AND RESPONSES TO DEFENDANT CASTLE HILL STUDIO LLC'S INTERROGATORIES NOS. 4-6 to counsel of record for Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC:

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